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DIRECTIVE

AUTHORIZATION BASIS

OPS-DIR-002

Revision 6

Date Effective: 5 January 2000

APPROVED: FRJ [Signature] 12/30/99
COO & Deputy General Manager

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1. PURPOSE

The purpose of this directive is to outline RMRS policy regarding authorization basis development, maintenance and compliance.

2. SCOPE

The scope of this directive identifies RMRS management expectations with regard to developing, maintaining and working within properly developed and approved authorization basis documentation. It is applicable to those radiological and non-radiological hazardous material activities conducted within RMRS scope of operations as defined herein.

3. DIRECTIVE

It is the policy of RMRS to conduct all of its operations in full compliance with appropriate authorization basis documentation. RMRS acknowledges the definition of authorization basis as addressed in DOE Order 5480.21, *Unreviewed Safety Questions*, and the RFETS Nuclear Safety Manual which states:

Those aspects of the facility design basis and operational requirements relied upon by DOE to authorize operation. These aspects are considered to be important to the safety of facility operations. The authorization basis is described in documents such as the facility Safety Analysis Report and other safety analyses; Hazard Classification Documents, the Technical Safety Requirements, DOE-issued safety evaluation reports, and facility-specific commitments made in order to comply with DOE Orders or policies.

In addition to defining authorization basis in accordance with DOE Order 5480.21, all hazard baseline documentation will be planned, developed, and maintained using the guidance found in DOE-EM-STD-5502-94, *Hazard Baseline Documentation*. This standard provides guidance on applicable safety basis documents, e.g., Safety Analysis Reports (SARs), auditable safety analyses, and health and safety plans (HASPs).

For RMRS facilities or activities, the authorization basis will address operational controls needed for safe operations of the facility or activity and the related safety analyses. For Hazard Category 2 and 3 nuclear facilities and activities, the authorization basis is described in documents such as: Preliminary Safety Analysis Reports (PSARs), Final Safety Analysis Reports (FSARs), Basis for Interim Operations (BIOs), Basis for Operations (BFOs), Justification for Continued Operations (JCOs), Unreviewed Safety Questions (USQs), Technical Safety Requirements (TSRs), Operational Safety Requirements (OSRs), Operational Controls, and DOE written Safety Evaluation Reports (SERs), Review Reports, and technical direction

REVIEWED FOR CLARITY
By [Signature] J N COMBES
Date 1/3/00

ADMIN RECORD

SW-A-003486

letters. Hazard Category 2 and 3 nuclear facilities and activities are defined as those which exceed the radiological thresholds in DOE-STD-1027-92.

For non-nuclear or radiological facilities and activities, the HASP and an auditable safety analysis, which may be appended or incorporated into the project or site-specific HASP, serve as the authorization basis. Non-nuclear and radiological facilities or activities are defined as those which exceed the documentation classification thresholds of DOE-EM-STD-5502-94.

Exhibit 1 is the official list of authorization basis documents for RMRS facilities, projects, and activities¹. Applicable RMRS facilities, projects, and activities shall comply with the appropriate authorization basis documents on this list. Responsibility for periodically updating this list resides with the Director, Nuclear Safety, in the Technical Support Division. Facility line management shall formally concur with the Authorization Basis List and any changes thereto. RMRS activities conducted in facilities where RMRS does not have landlord responsibilities shall comply with the appropriate authorization basis documents defined and approved by that facility.

When the work deviates from the approved operating conditions of the facility or activity and an unanticipated hazard or condition develops, the work or activity will pause and an evaluation will take place to assess the potential hazard or condition as required by RMRS OPS-DIR-001, *Safety and Environmental Stewardship Directive*. If the operational controls are not sufficient to adequately address the new circumstances, a revised or new authorization basis may be required. It is incumbent upon the project, facility, or technical manager to recognize these unanalyzed situations and request the necessary evaluation and revision to the applicable authorization basis in order to proceed with the work in a safe and compliant manner.

As part of the readiness evaluation of RMRS facilities and activities, the authorization basis will be evaluated for completeness and appropriateness by RMRS and Kaiser-Hill management. Subsequent to startup of operations, periodic assessments will be conducted on the authorization basis by the cognizant manager and the RMRS Technical Support Division.

4. REFERENCES

- 4.1 DOE Order 5480.21, *Unreviewed Safety Questions*.
- 4.2 Rocky Flats Environmental Technology Site, *Nuclear Safety Manual*, 1-MAN-018-NSM.
- 4.3 DOE Limited Standard, DOE-EM-STD-5502-94, *Hazard Baseline Documentation*.
- 4.4 DOE Standard, DOE-STD-1027-92, *Hazard Categorization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear Safety Analysis Reports*.
- 4.5 OPS-DIR-001, *Safety and Environmental Stewardship Directive*, Rocky Mountain Remediation Services, L.L.C.

¹ The official list of authorization basis documents for Buildings 771/774, 776/777, 779, and 991 is contained in Operations Orders OO-771-129, OO-776-311, OO-779-141, and OO-991-008, respectively.

ROCKY MOUNTAIN REMEDIATION SERVICES
AUTHORIZATION BASIS LIST

OPS-DIR-002
Exhibit 1

| Facility/Project | Current AB Document(s) | Notes |
|------------------|---|---|
| All Facilities | <p>Site SAR Volume I (including Site Controls) Rev. 1 (5/99)</p> <ul style="list-style-type: none"> USQ: USQD-RFP-98.1568-SMS, Non-Destructive Assay (NDA) Instrument Uncertainties and Effects on MAR Assumptions, Rev. 1 DOE Letter: AME:ABD:EF:02930, dated 3-30-99. JCO: JCO-RFP-98.1190-KGH, Justification for Continued Operation (JCO) Addressing Unattended Outdoor Storage of Wooden Crates Containing Low Level Waste (LLW) or Low Level Mixed Waste (LLMW), Rev. 0. USQ: USQD-RFP-98.1000-MRA, Rev. 0. DOE Letter: AME:ABD:MER:03132, dated 10-5-98 (approval for Rev. 0). DOE Letter: AME:ABD:RGB:02938, dated 4-5-99 (approval for JCO extension). Site Transportation Safety Manual Rev. 0 (11/99) DOE Letter: AME:ABD:MM:00-00331, dated 11-9-99. | |
| | <p>Site Facilities and Transportation</p> | <p>JCO approved by DOE on 10-5-98 with additional technical direction. JCO and DOE Technical Direction requirements and RMRS implementation policy are contained in OPS-DIR-018.</p> <p>JCO Expires: When individual facility authorization basis documents incorporate JCO controls.</p> |

ROCKY MOUNTAIN REMEDIATION SERVICES
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| Facility/Project | Current AB Document(s) | Notes |
|------------------|---|--|
| Building 440 | Category 2 Nuclear Facilities | |
| | BFO (including Operational Controls) Rev. 6 (6/98) | BFO Rev. 6 approved by DOE on 6-1-98. |
| | <ul style="list-style-type: none"> JCO: JCO-RFP-99.0344-BDB, <i>Inoperable Signal Input/Output (SIO) Panels Due to Replacement of the Fire and Security Computer System (SCS)</i>, Rev. 2. USQ: USQD-RFP-99.0348-SMS/BJJS, Rev. 2. DOE Letter: AME:ABD:TPD:99-03101, dated 10-13-99 (approval for Rev. 2). | JCO actions to remain in place until such time as the Central Alarm Station and Fire Dispatch Center external delta point reporting capability is determined to be functioning properly and the Site Chief Engineer has declared the Security Computer System to be Operable. JCO Expires: 1-11-00. |
| | Operations Order: OO-SWO-005, Prohibition on Accepting for Storage Plutonium Wastes with Chloride Salts, Rev. 0. | Operations Order Expires: 12-17-00. |
| Building 569 | BIO (including TSRs) Rev. 3 (9/99) | BIO Rev. 3 approved by DOE on 7-2-99 with additional technical direction. |
| | <ul style="list-style-type: none"> DOE Letter: AME:ABD:TPD:99-03029, dated 7-2-99 (approval for Rev. 3) | |
| | Operations Order: OO-SWO-005, Prohibition on Accepting for Storage Plutonium Wastes with Chloride Salts, Rev. 0. | Operations Order Expires: 12-17-00. |
| | <ul style="list-style-type: none"> JCO: JCO-569-99.1177-JSK, <i>Justification for Continued Operation (JCO): Plant Fire Security Replacement (PFSR), Pass 3 Fire Alarm Control Panels (FACP) 4, 5, and 2, Rev. 1.</i> USQ: USQD-569-99.1176-JSK, Rev. 1. DOE Letter: AME:ABD:DEF:03001, dated 6-8-99 (approval for Rev. 0). DOE Letter: AME:ABD:TPD:00-00391, dated 11-8-99 (approval for JCO extension). | JCO extension approved by DOE on 11-8-99 with additional technical direction. JCO Rev. 1 incorporates DOE technical direction. JCO Expires: 3-30-00. |

ROCKY MOUNTAIN REMEDIATION SERVICES
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| Facility/Project | Current AB Document(s) | Notes |
|------------------|--|--|
| Building 664 | <ul style="list-style-type: none"> • FSAR (including TSRs) Rev. 7 (8/99) | <p>FSAR Rev. 7 approved by DOE on 8-5-99 with additional technical direction.</p> <p>Operations Order Expires: 12-17-00.</p> <p>JCO Rev. 0 approved by DOE on 10-8-99 with additional technical direction. JCO Rev. 1 incorporates DOE technical direction. JCO Rev. 2 approved by DOE on 11-5-99.</p> <p>JCO Expires: 2-8-00.</p> |
| | <ul style="list-style-type: none"> • DOE Letter: AME:ABD:TPD:99-02540, dated 8-5-99 (approval for Rev. 7). | |
| | <p>Operations Order: OO-SWO-005, <i>Prohibition on Accepting for Storage Plutonium Wastes with Chloride Salts</i>, Rev. 0.</p> | |
| | <ul style="list-style-type: none"> • JCO: JCO-RFP-00.0004-CAS, <i>Storage, Application of Epoxy to Bolts, and Torque Verification of POCs Without Torque Documentation in Buildings 664, and on the 750 Pad</i>, Rev. 2. | |
| | <ul style="list-style-type: none"> • USQD: USQD-RFP-00.0012-CAS, Rev. 2. | |
| | <ul style="list-style-type: none"> • DOE Letter: AME:ABD:TPD:00-00072, dated 10-8-99 (approval for Rev. 0) | |
| | <ul style="list-style-type: none"> • DOE Letter: AME:ABD:MER:00-00430, dated 11-5-99 (approval for Rev. 2). | |

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| Facility/Project | Current AB Document(s) | Notes |
|------------------|---|--|
| Building 886 | BIO (including Interim TSRs) Rev. 5 (11/05/97) | BIO Rev. 5 approved by DOE on 10-20-97. |
| | <ul style="list-style-type: none"> JCO: JCO-RFP-98.0288-KGH, Justification for Continued Operation (JCO) Addressing RFETS Non-Compliance With Pressure Safety Program Requirements, Rev. 1. USQ: USQD-RFP-97.0106-CAS, Rev. 2. DOE Letter: AME:ABD:JMC:02964, dated 5-20-98. JCO: JCO-RFP-98.0661-SMS, Criticality Accident Alarm System (CAAS) Internal and External Alarm Audibility, Rev. 2. USQ: USQD-RFP-98.0628-MRA, Rev. 0. DOE Letter: AME:ABD:DEF:03049, dated 9-1-98 (approval for Rev. 0). DOE Letter: AME:ABD:RGB:02894, dated 2-24-99 (approval for JCO extension). | <p>JCO approved by DOE on 5-20-98 with additional technical direction.</p> <p>JCO Rev. 0 approved by DOE on 9-1-98 with additional technical direction. JCO Rev. 1 incorporates DOE technical direction. JCO will remain in place until the criticality alarm system is deactivated.</p> |

ROCKY MOUNTAIN REMEDIATION SERVICES
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Exhibit 1

| Facility/Project | Current AB Document(s) | Notes |
|------------------|--|--|
| 750/904 Pads | Category 2/3 Nuclear Facilities | |
| | <ul style="list-style-type: none"> FSAR (including TSRs) Rev. 8 (4/99) | FSAR Rev. 8 approved by DOE on 4-5-99. with additional technical direction. Technical Direction #1, #2, and #4 incorporated into FSAR Rev. 8. Technical Direction #3 to be incorporated into next annual update. |
| | <ul style="list-style-type: none"> DOE Letter: AME:ABD:MER:02875, dated 4-5-99 | |
| | <ul style="list-style-type: none"> JCO: JCO-RFP-98.0288-KGH, Justification for Continued Operation (JCO) Addressing RFETS Non-Compliance With Pressure Safety Program Requirements, Rev. 1. | Tents 2 & 12 on 750 Pad are Nuclear Hazard Category 2. |
| | <ul style="list-style-type: none"> USQ: USQD-RFP-97.0106-CAS, Rev. 2. | JCO approved by DOE on 5-20-98 with additional technical direction. Compliance with Pressure Safety Program required by end of FY00. |
| | <ul style="list-style-type: none"> DOE Letter: AME:ABD:JMC:02964, dated 5-20-98. | |
| | <ul style="list-style-type: none"> USQ: USQD-750-99.0832-CAS, 750 Pad Sludge Removal, Rev.0. | |
| | <ul style="list-style-type: none"> DOE Letter: AME:ABD:DGG:99-03015, dated 6-21-99. | |
| | <ul style="list-style-type: none"> JCO: JCO-RFP-00.0004-CAS, Storage, Application of Epoxy to Bolts, and Torque Verification of POCs Without Torque Documentation in Buildings 664, and on the 750 Pad, Rev. 2. | JCO Rev. 0 approved by DOE on 10-8-99 with additional technical direction. JCO Rev. 1 incorporates DOE technical direction. JCO Rev. 2 approved by DOE on 11-5-99. |
| | <ul style="list-style-type: none"> USQD: USQD-RFP-00.0012-CAS, Rev. 2. | JCO Expires: 2-8-00. |
| | <ul style="list-style-type: none"> DOE Letter: AME:ABD:TPD:00-00072, dated 10-8-99 (approval for Rev. 0) | |
| | <ul style="list-style-type: none"> DOE Letter: AME:ABD:MER:00-00430, dated 11-5-99 (approval for Rev. 2). | |

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| Facility/Project | Current AB Document(s) | Notes |
|--------------------------------------|--|---|
| Category 3 Nuclear Facilities | | |
| Building 881 | Facility Safety Analysis (Site SAR Volume II) Rev. 0 (6/98) | FSA Rev. 0 approved by DOE on 11-30-98. JCO approved by DOE on 5-20-98 with additional technical direction. Compliance with Pressure Safety Program required by end of FY00. |
| | • JCO: JCO-RFP-98.0288-KGH, Justification for Continued Operation (JCO) Addressing RFETS Non-Compliance With Pressure Safety Program Requirements, Rev. 1. | |
| | • USQ: USQD-RFP-97.0106-CAS, Rev. 2. | |
| | • DOE Letter: AME:ABD:JMC:02964, dated 5-20-98. | |
| Building 906 | FSAR (including TSRs) Rev. 6 (12/98) | |

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| Facility/Project | Current AB Document(s) | Notes |
|---------------------------------------|--|---|
| Building 126 | Facility Safety Analysis (Site SAR Volume II) Rev. 1 (5/99) | |
| Building 444 Cluster | Facility Safety Analysis (Site SAR Volume II) Rev. 1 (5/99) <ul style="list-style-type: none"> JCO: JCO-RFP-98.0288-KGH, Justification for Continued Operation (JCO) Addressing RFETS Non-Compliance With Pressure Safety Program Requirements, Rev. 1. USQ: USQD-RFP-97.0106-CAS, Rev. 2. DOE Letter: AME:ABD:JMC:02964, dated 5-20-98. | JCO approved by DOE on 5-20-98 with additional technical direction. Compliance with Pressure Safety Program required by end of FY00. |
| Building 666 | Facility Safety Analysis (Site SAR Volume II) Rev. 0 (4/97) | |
| Building 790 | Facility Safety Analysis (Site SAR Volume II) Rev. 1 (5/99) <ul style="list-style-type: none"> JCO: JCO-RFP-98.0288-KGH, Justification for Continued Operation (JCO) Addressing RFETS Non-Compliance With Pressure Safety Program Requirements, Rev. 1. USQ: USQD-RFP-97.0106-CAS, Rev. 2. DOE Letter: AME:ABD:JMC:02964, dated 5-20-98. | JCO approved by DOE on 5-20-98 with additional technical direction. Compliance with Pressure Safety Program required by end of FY00. |
| Buildings 903A&B, 966 | Facility Safety Analysis (Site SAR Volume II) Rev. 1 (5/99) | |
| Process Waste Transfer System | Facility Safety Analysis (Site SAR Volume II) Rev. 2 (6/99) | |
| RCRA Storage Units | Facility Safety Analysis (Site SAR Volume II) Rev. 2 (8/98) | |
| T-1 Source Removal Project (IHSS 108) | HASPIASA | ASA documented in report RF/RMRS-98-215, Rev. 2 (1/99), Safety Analysis for Individual Hazardous Substance Site (IHSS) 108 Trench 1 (T-1) Source Removal Project. |

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Date Effective: 5 January 2000

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| Facility/Project | Current AB Document(s) | Notes |
|------------------|--|-----------------------------------|
| Building 891 | Facility Safety Analysis (Site SAR Volume II) Rev. 1 (5/99) | Non-Nuclear Low Hazard Facilities |

Legend:

AB: Authorization Basis
 ASA: Auditable Safety Analysis
 BERO: Building Emergency Response Operations
 BFO: Basis for Operation
 BIO: Basis for Interim Operation
 FSA: Facility Safety Analysis
 FSAR: Final Safety Analysis Report
 HASP: Health and Safety Plan
 IHSS: Individual Hazardous Substance Site
 JCO: Justification for Continued Operation
 LCO: Limiting Condition for Operation
 OSRs: Operational Safety Requirements
 RR: Review Report
 SAR: Safety Analysis Report
 SER: Safety Evaluation Report
 TSRs: Technical Safety Requirements
 USQ: Unreviewed Safety Question
 USQD: Unreviewed Safety Question Determination